

**Worksheet**  
**Determination of NEPA Adequacy (DNA)**  
**U.S. Department of the Interior**  
**Bureau of Land Management**

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**Project Lead:** Dan Erbes  
**Field Office:** Sierra Front  
**Lead Office:** Sierra Front  
**Case File/Project Number:** N-90640  
**NEPA NUMBER:** DOI-BLM-NV-C020-2012-0019-DNA  
**Project Name:** Silver Knolls Pit Free Use Permit Renewal  
**Applicant Name:** Washoe County Road Department  
**Project Location:** Sec. 14, SWSW, T. 21 E., R. 18 E.;  
Sec. 14, S2SWNWSW, T. 21 E., R. 18 E.;  
Washoe County, Nevada

**A. Description of the Proposed Action and any applicable mitigation measures:**

The proposed action is re-issuing a free use permit (FUP) to Washoe County Road Department (WCRD) for the continued removal of mineral materials from Silver Knolls Pit for an additional 10 year period. The free use permit (N-63206) held previously by WCRD expired on September 30, 2011. The Silver Knolls Pit and associated access route resides entirely on public land and has been operated by WCRD since 1977.

The material being mined from the quarry is diorite, a coarse grained intrusive rock. The mined and processed rock is principally used as aggregate base. Other uses include landscape rock and boulders among other things. The material has been used for these purposes on public projects in the Reno-Sparks area for approximately 34 years.

**B. Land Use Plan (LUP) Conformance**

*List any applicable LUPs and their dates.*

**Name of Plan:** Carson City Field Office Consolidated Resource Mgmt. Plan (CRMP) Approved May 9, 2001, and; the Southern Washoe County Urban Interface Plan Approved January 11, 2001.

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions: N/A

The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions):

The Southern Washoe County Urban Interface Plan is incorporated into the CCFO-CRMP, wherein under the Administrative Actions stated in Section 10 on Page MIN-5, the CRMP proposes to:

“continue to provide mineral material commodities to the using public following these criteria: (A) Avoid duplication of pits within the same general area; (B) examine hauling distances and place sites according to acceptable VRM classification where possible; (C) use existing sites to the greatest extent possible; (D) for major transportation R/Ws, place sites a minimum of 10 miles apart; and, (E) determine the life expectancy of sites and set rehabilitation requirements in advance.”

The proposed action is in also conformance with the CRMP as it would facilitate providing mineral materials commodities to the using public pursuant to all applicable criteria stated.

**C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

List by name and date all applicable NEPA documents that cover the proposed action.

- Technical Field Examination and Environmental Analysis Record - Proposed Washoe County Road Division Material Site; Silver Knolls Area, May 11, 1977.
- DNA No. NV-030-01-05 – Free Use Permit for Existing Silver Knolls Common Borrow Pit, August 7, 2001.

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

- Archaeological Clearance of Washoe County Exploration Permit: Red Rock Area, November 17, 1975.
- Cultural Resources Needs Assessment CCFO-CR-01-241, August 2, 2001.

**D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

Yes. The proposed action of continuing to mine mineral material from the subject deposit is the same as the alternative analyzed and selected in the Technical Field Examination and Environmental Analysis Record in 1977. Additionally, the DNA completed subsequently in 2001 facilitated re-issuance of the FUP for an additional ten year period at the rate of approximately 8,000 cubic yards (12,000 tons) per year. The new proposed action would allow for the same level of operations to occur within the same analysis area to that of the existing NEPA documents. The new proposed action would abide by the same special stipulations and allow for an additional 80,000 cubic yards (120,000 tons) of material to be removed from the permit area over an additional ten year period.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

Yes. The existing NEPA document included an appropriate range of alternatives. In addition to the "No Action" alternative, the existing NEPA document included the following alternatives which were eliminated from detailed consideration: Limit mining to existing disturbed area at a previous location; and, mine material from another new site other than the proposed site. The former alternative was eliminated due to access constraints, while the later alternative would have resulted in the extraction and use of less desirable material. The new proposed action would facilitate the continued removal of mineral materials for public projects from an existing material site which lies approximately one mile from the nearest residence and is accessed entirely over public land from Red Rock Road.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, range- land health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

Yes. The project area has been pre-stripped ahead of mining operations to facilitate stockpiling of soil cover for final reclamation. As such no undisturbed areas exist within the project area. Therefore it is not likely that new information and circumstances would substantially change the analysis of the new proposed action. The interdisciplinary review completed by BLM in 2001 prior to re-issuance of the FUP for an additional ten-year-period echoed that conclusion.

**4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

Yes. Because the average production from the Silver Knolls Pit will not change, the direct, indirect and cumulative effects would not change substantially. This is based on the premise that if the new proposed action were not to occur, the necessary supply of mineral material would likely come from a new source on public or private land in the same proximity, which would result in similar direct, indirect and cumulative impacts.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

Yes. The existing NEPA document cites that public involvement was solicited in association with the public hearing held by the the Regional Planning Commission which granted the original Special Use Permit for the project. The outcome of that public hearing suggested that objections were few or totally lacking, and Silver Knolls residents were clearly in favor of the proposal. New public interest is not likely due to the lack of new development which has occurred within a mile radius of the project area since the FUP was originally permitted.

**E. Persons/Agencies/BLM Staff Consulted**

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
James Carter	Archaeologist <i>fc</i>	Cultural Resources

Note: Refer to the EA for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

**Conclusion:** Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.



Signature of Project Lead



Signature of NEPA Coordinator



Bryan S. Hockett, Acting Field Manager  
Sierra Front Field Office

Date 12/28/2011

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.